

General Office and third party must be produced.

DEFINITIONS

1. "Date" shall mean the exact day, month and year, if ascertainable, or if not, the best approximation, including any relationship to other known events.

2. "Document" includes, without limitation, any written, printed, typed, or other graphic matter of any kind or nature, whether sent or received or neither, including drafts and copies bearing any marks (such as initials, comments, notations, notes or stamped indices) not found on the original, and includes, without limitation, all memoranda, reports, notes, transcripts, letters, envelopes, telegrams, cables, telexes, telephone bills, messages, intra or inter office memoranda, work papers, diaries, desk calendars, appointment books, drafts, minutes or transcriptions of meetings and other documents of every type, and all mechanical or electrical sound recordings, magnetic tapes, or other material.

3. "Communication" means all oral, written, electronic, and mechanical modes of transmission of facts, knowledge, thoughts, opinions, ideas, documents, images, and/or information, such as, but not limited to, telephone, email, email attachments, email meeting invitations, text messages, or written or spoken language between two or more people.

4. "Meeting" means any coincidence or presence of persons, whether by chance or prearranged, including, but not limited to, a formal or informal gathering, luncheon, dinner, social or business occasion, or any other group situation of two or more persons.

5. "Person" or "persons" mean natural persons (whether or not deceased), businesses, partnerships, firms, limited liability companies, associations, corporations, quasi-governmental entities, and governmental entities, including but not limited to their predecessors, successors, parents, subsidiaries, affiliates, divisions, departments, and other units thereof, and their elected

officials, appointees, officers, directors, employees, agents, contractors, and attorneys.

6. The terms “identify”, “identity”, and “identification” mean to provide, when used in reference to:

- (a) A natural person, their:
 - (i) full name and all other names they have used or by which they have ever been known;
 - (ii) present or last-known residences and business address (including street name and number, city or town, and state or country) and all other known addresses;
 - (iii) present position, business affiliation and job description (if the present business or residence addresses or job description are unknown, such a statement and the corresponding last-known such information) and all other jobs and positions they have held;
 - (iv) position, business affiliation and job description at the time in question, with respect to the Interrogatory or other request involved.
- (b) A document:
 - (i) its description (e.g., letter, memorandum, report, etc.), its record number or other identifying number, and the number of pages it contains;
 - (ii) its title and date (and if no date appears thereon, the Answer shall so state and shall give the date or approximate date that such document was prepared);
 - (iii) its subject matter;
 - (iv) its author’s identity;
 - (v) its addressee’s identity;
 - (vi) the identity of each person who signed it;
 - (vii) the identity of each person who used, viewed, sent and/or received it; and,
 - (viii) its present location and its custodian’s identity, or is such document was, but no longer is, in the possession or subject to control of the Plaintiff, so state and provide the manner and date of its disposition and identify the person disposing it.

(c) Any other context:

(i) a description with sufficient particularity that the thing may thereafter be requested, specified, and recognized, including relevant dates and places, entities and documents;

9. “You” and “your” means Chuck Gray in his capacity as Wyoming Secretary of State.

10. “Petition” shall mean the Petition for Permanent Injunction filed by the Wyoming Secretary of State, Chuck Gray, on December 17, 2024.

11. “Petitioner” shall mean the Wyoming Secretary of State’s Office and its representatives, attorneys, agents, employees, or any person acting on its behalf.

12. “Select Committee” shall mean the Wyoming Legislature Select Committee on Blockchain, Financial Technology and Digital Innovation Technology.

13. “Securities Act” shall mean the Wyoming Uniform Securities Act.

14. “DAO Supplement” shall mean the Wyoming Decentralized Autonomous Organization Supplement.

15. “Regulatory Criteria within the Secretary of State Office” shall mean the specific standards, rules, and guidelines that the Wyoming Secretary of State’s Office uses to implement and enforce laws passed by the Wyoming legislature.

16. The term “and” includes the term “or,” and the term “or” includes the term “and.” The singular includes the plural and the plural includes the singular. The masculine includes the feminine, and the feminine includes the masculine.

REQUESTS FOR PRODUCTION OF DOCUMENTS

DOCUMENT REQUEST NO. 1: All DOCUMENTS AND COMMUNICATIONS containing or relating to the regulatory criteria within the Secretary of State’s Office which guided Petitioner

in its application of the Securities Act to CryptoFed in its October 17, 2024, notice letter (OHK000003-000007).

RESPONSE:

Background for Document Request No. 2: Regarding providing CryptoFed with the Petitioner's decision in writing, in his testimony before the Select Committee on September 16, 2024, Mr. Crossman said, "We have asked them numerous times to retain a counsel. We can't tell them that things would be. I mean, while I personally am a member of the bar. I am not their attorney...In this position, if somebody weren't a member of the bar, they would be potentially engaging in unlicensed practice, if they were to render this decision directly to them without them having a counsel. They refused to get a counsel. ... At a higher level, they do need to get a counsel." (available at 12:16 - 13:30, <https://www.youtube.com/live/hlnJDwInl6c>).

DOCUMENT REQUEST NO. 2: All DOCUMENTS AND COMMUNICATIONS containing or relating to the regulatory criteria within the Secretary of State Office which required CryptoFed to retain counsel, in order that the Secretary of State's Office could render its written decision to CryptoFed through its counsel.

RESPONSE:

DOCUMENT REQUEST NO. 3: All DOCUMENTS AND COMMUNICATIONS containing or relating to the reason(s) that Petitioner's notice letter sent to CryptoFed on October 17, 2024, only mentioned the Petitioner's authority to enforce the Wyoming Uniform Securities Act under W.S. 17-4-604, and not its enforcement authority under W.S. 17-4-603 (SOS- 000005).

RESPONSE:

DOCUMENT REQUEST NO. 4: All DOCUMENTS AND COMMUNICATIONS containing or relating to how Petitioner was to handle CryptoFed's five letters dated October 28, 2024, November 17, 2024, November 28, 2024, December 6, 2024 and December 15, 2024 respectively.

RESPONSE:

DOCUMENT REQUEST NO. 5: All DOCUMENTS AND COMMUNICATIONS containing or relating to Petitioner’s decision to enforce the Wyoming Uniform Securities Act under W.S. 17-4-603, rather than its enforcement authority under W.S. 17-4-604.

RESPONSE:

DOCUMENT REQUEST NO. 6: All DOCUMENTS AND COMMUNICATIONS containing or relating to Petitioner’s reason for waiting until December 17, 2024, to file its Petition.

RESPONSE:

DOCUMENT REQUEST NO. 7: All DOCUMENTS AND COMMUNICATIONS containing or relating to the reason for Petitioner’s refusal to answer CryptoFed’s question, “can American CryptoFed DAO legally distribute Locke tokens to its contributors within the State of Wyoming, free of charge?” (OHK000001) until it issued the October 17, 2024 letter (OHK000003-000007)

RESPONSE:

DOCUMENT REQUEST NO. 8: All DOCUMENTS AND COMMUNICATIONS containing or relating to Petitioner’s allegation, “By providing owners with governance rights, Locke tokens will constitute interests in a limited liability company, specifically, CryptoFed” (Petition, Allegation 19, p.4).

RESPONSE:

DOCUMENT REQUEST NO. 9: All DOCUMENTS AND COMMUNICATIONS containing or relating Petitioners application of Wyo. Stat. Ann. § 17-4-102(a)(xxviii)(E) to CryptoFed by alleging, “Interests in limited liability companies constitute investment contracts, and therefore securities” (Petition, Allegation 19, p.4).

RESPONSE:

DOCUMENT REQUEST NO. 10: All DOCUMENTS AND COMMUNICATIONS containing or relating to Petitioner’s statement in its October 17, 2024 Letter to CryptoFed that CryptoFed’s plan to issue Locke tokens satisfies all the elements of “the somewhat stricter *Howey* test” and “the Wyoming statutory instantiation of the *Howey* test in W.S. 17-4-102(a)(xxviii)(D)” (SOS-000004).

RESPONSE:

Background for Request for Production of Document No. 11: In response to Senator Chris Rothfuss’ question during his testimony before the Select Committee on May 14, 2025, the Secretary said, “I feel the need to correct the record and enforce the laws of state [of law], when you push back with fraud, potential fraud...” (available at 3:21:30-3:23:00), https://www.youtube.com/live/3R2FA6u_qC4).

DOCUMENT REQUEST NO. 11: All DOCUMENTS AND COMMUNICATIONS containing or relating to Petitioner's allegation of fraud or potential fraud against CryptoFed, the victims, or potential victims, and the losses suffered.

RESPONSE:

DOCUMENT REQUEST NO. 12: All DOCUMENTS AND COMMUNICATIONS containing or relating to the relationship between the Wyoming Limited Liability Company Act and the DAO Supplement, leading to the Petitioner’s statement in its October 17, 2024 Letter to CryptoFed, “The Wyoming DAO is merely an instance of a Limited Liability Company (W.S. 17-31-102(a)(ii)).” (SOS-000002).

RESPONSE:

DOCUMENT REQUEST NO. 13: All DOCUMENTS AND COMMUNICATIONS containing or relating to the Petitioner’s statement in the SoS October 17, 2024 Letter to CryptoFed, “...the ‘investment of money’ is any exchange of value...”, (SOS- 000003).

RESPONSE:

DOCUMENT REQUEST NO. 14: All DOCUMENTS AND COMMUNICATIONS containing or relating to the ruling in *SEC v. Ripple Labs* by the U.S. District Court for the Southern District of New York, and its application to CryptoFed which was referenced in the SoS October 17, 2024 Letter to CryptoFed (SOS- 000005, footnote No.8).

RESPONSE:

DOCUMENT REQUEST NO. 15: All DOCUMENTS AND COMMUNICATIONS containing or relating to the characteristics of CryptoFed's plan to issue Locke tokens, which was summarized in the SoS October 17, 2024, notice letter (SOS-000001 - SOS-000002).

RESPONSE:

DOCUMENT REQUEST NO. 16: All DOCUMENTS AND COMMUNICATIONS dated or created after November 25, 2023, not already produced in response to any other Request for Production, which pertain to CryptoFed.

RESPONSE:

DOCUMENT REQUEST NO. 17: All COMMUNICATIONS dated or created after November 25, 2023, of any kind between you and any third-party relating to CryptoFed.

RESPONSE:

Dated this 14 day of August 2025

AMERICAN CRYPTO FED DAO, LLC,
Respondent

/s/ L. Cooper Overstreet

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CERTIFICATE OF SERVICE

This is to certify that on the 14th day of August 2025 a true and correct copy of the foregoing was served via File & ServeXpress on the following:

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